

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

JOSEPH VAN LOON; TYLER ALMEIDA;
ALEXANDER FISHER; PRESTON VAN LOON;
KEVIN VITALE; and NATE WELCH,

Plaintiffs,

- against -

DEPARTMENT OF THE TREASURY; OFFICE OF
FOREIGN ASSETS CONTROL; JANET YELLEN,
in her official capacity as Secretary of the Treasury; and
ANDREA M. GACKI, in her official capacity as Director
of the Office of Foreign Assets Control,

Defendants.

No. 1:23-cv-312-RP

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE MOTION FOR
PARTIAL SUMMARY JUDGMENT IN EXCESS OF THE COURT'S PAGE LIMITS**

Plaintiffs Joseph Van Loon, Tyler Almeida, Alexander Fisher, Preston Van Loon, Kevin Vitale, and Nate Welch respectfully move for leave to file a motion for partial summary judgment in excess of the Court's page limits as follows:

1. On February 10, 2023, the Parties filed a Joint Motion for Entry of Scheduling Order. Dkt. 27.
2. On March 24, 2023, following the transfer of this case from the Waco Division to the Austin Division, the Parties renewed their Joint Motion for Entry of Scheduling Order. Dkt. 37. Both Joint Motions for Entry of Scheduling Order reflect the Parties' agreed-upon length and timing for further briefing in this case.
3. Plaintiffs respectfully seek leave to file their motion for partial summary judgment that complies with the Parties' agreed-upon length and timing as set forth in the currently pending

Joint Motion for Entry of Scheduling Order. Dkt. 37. Plaintiffs' motion complies with the Joint Motion for Entry of Scheduling Order but exceeds the page limits set forth in Rule CV-7 by five pages, as defined in Rule CV-7(C)(2).

4. Plaintiffs respectfully inform the Court that expanded page lengths are necessary to ensure that both Parties have sufficient opportunity to discuss and explain the technical nature of this case and the statutory and constitutional issues raised.

5. Plaintiffs have consulted with Defendants, who state their position as follows: Defendants consent to the Plaintiffs' requested page extension, on the condition that the Court afford them until May 3, 2023 to file a 40-page combined cross-motion and opposition, in accordance with the Parties' joint scheduling proposal at Dkt. 37.

Dated: April 5, 2023

Respectfully submitted,

PAUL, WEISS, RIFKIND,
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/s/ Kannon K. Shanmugam

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